

PATENT
Atty. Dkt. No. CRUI/0011

IN THE DRAWINGS

Figure 2 has been added. Figure 2 is from U.S. Publication No. 2005/0251035 to Simpson et al., which was incorporated by reference in its entirety. No new matter has been added.

Attachment: Replacement Sheet
 Annotated Sheet Showing Changes

REMARKS

This is intended as a full and complete response to the Office Action dated February 13, 2006, having a shortened statutory period for response set to expire on May 13, 2006. Please reconsider the claims pending in the application for reasons discussed below.

Claims 1-81 remain pending in the application after entry of this response. Claims 1-81 are rejected and claims 4 and 42 are objected to by the Examiner. Claims 21-25, 28, 30, 37, 45, 47, 49, 55, 65, 68, 69, and 75-78 would be allowable if rewritten to overcome the rejection(s) under 35 U.S.C. § 112, 2nd paragraph. Claims 22-25, 42, 45, 47, 56, 68-69, 73-75, 79, 80 and 81 have been cancelled. Reconsideration of the pending claims is requested for reasons presented below.

Specification

The specification is objected to as all claimed features need to be disclosed in details in the specification. Paragraphs [0047]-[0053] have been added. The new paragraphs are from U.S. Publication No. 2005/0251035 to Simpson et al., which was incorporated by reference in its entirety. No new matter has been added. Removal of the objection is requested.

Drawings

The drawings stand objected to under 37 C.F.R. § 1.83(a). Figure 2 has been added. Figure 2 is from U.S. Publication No. 2005/0251035 to Simpson et al., which was incorporated by reference in its entirety. No new matter has been added. Removal of the objection is requested.

Claim Objections

Claims 4 & 42 are objected to because of the following informalities: similar claim nature. Claim 42 has been cancelled, therefore withdraw of the objection is requested.

Claim Rejections Under 35 U.S.C. § 112

Claim 2 recited the limitation "the nature" in line 1. Claim 2 has been amended to overcome this rejection.

Claim 6 recites the limitation "the direction" in line 1. Claim 6 has been amended to overcome this rejection.

Claim 23 recites the limitation "the pressure" in line 1. Claim 23 has been cancelled.

Claim 29 recites the limitation "the amplitude" in line 1. Claim 29 has been amended to overcome this rejection.

Claim 30 recites the limitation "the frequency" in line 1. Claim 30 has been amended to overcome this rejection.

Claim 31 recites the limitation "the form" in line 1. Claim 31 has been amended to overcome this rejection.

Claim 34 recites the limitation "the form" in line 1. Claim 34 has been amended to overcome this rejection.

Claim 37 recites the limitation "the range" in line 1. Claim 37 has been amended to overcome this rejection.

Claim 44 recites the limitation "the driving force" in line 1. Claim 44 has been amended to overcome this rejection.

Claim 51 recites the limitation "the diameter" in line 1. Claim 51 has been amended to overcome this rejection.

Claim Rejections Under 35 U.S.C. § 102

Claims 1-20, 26, 27, 29, 31-36, 38-44, 46, 48, 50-54, 56-64, 66, 67, 70-74, and 79-81 are rejected under 35 U.S.C. § 102(b) as being anticipated by *Tooker* (4,204,312).

Regarding claim 1, *Tooker* discloses an ultrasonic vibrator 4A, not creating the vibration with fluid. Therefore, *Tooker* does not teach, show, or suggest creating the vibration with fluid flowing through at least one of the expansion device and the tubing as disclosed in amended claim 1. Therefore, Applicants believe that claims 1-21, 26-41, 43-44, 46, and 48-55 are in condition for allowance.

Regarding claim 56, *Tooker* does not disclose expanding a tubing in a wellbore. Therefore, *Tooker* does not teach, show, or suggest locating a tubing in a wellbore, locating an expansion device in the tubing to be expanded and vibrating the expansion device as disclosed in amended claim 56. Therefore, Applicants believe that claim 56 is in condition for allowance.

Regarding claim 57, *Tooker* discloses an ultrasonic vibrator 4A, not creating a fluid pressure differential. Therefore, *Tooker* does not teach, show, or suggest a pressure device for creating a fluid pressure differential across a tubing wall adjacent the expansion device as disclosed in amended claim 57. Therefore, Applicants believe claims 57-67, and 70-72 are in condition for allowance.

New Claims

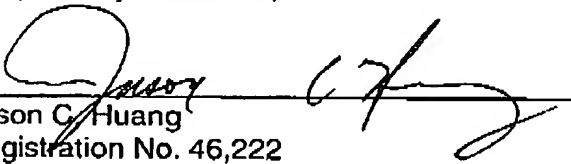
New claims 82-89 have been added. Claims 82-86 are allowable claims 22-24, 45 and 47 respectively, rewritten in independent form. Claims 87-89 are allowable claims 68, 69 and 75 respectively, rewritten in independent form. Therefore, Applicants submit that claims 82-89 are in condition for allowance.

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Conclusion

The references cited by the Examiner, alone or in combination, do not teach, show, or suggest the invention as claimed. Having addressed all issues set out in the office action, Applicants respectfully submit that the claims are in condition for allowance and respectfully request that the claims be allowed.

Respectfully submitted,



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